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2 5 Shetland Close
3 Coventry, England CV5 7LS
4 Telephone: 044 7827964404
5 Email: marc@mwwolf-fiction.co.uk
Plaintiff in Pro Per

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9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 MARC WOLSTENHOLME,
12 Plaintiff,
vs.
13 RIOT GAMES, INC.,
14 Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

Hon. Fernando M. Olguin

DECLARATION OF MARC
WOLSTENHOLME

EXHIBIT A1- A5 - MEET AND CONFER
CHART - AND ALL PAPERS AND
RECORDS ON FILE IN THIS ACTION,
ONGOING HARASSMENT AND MR.
GELLER'S BAD FAITH ANTICS

17 Dated this: May 07, 2025

M.WOLSTENHOLME.

18
19 [MARC WOLSTENHOLME]

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25
26 EXHIBIT A1- A5 - MEET AND CONFER CHART - AND ALL PAPERS AND RECORDS ON FILE IN THIS
27 ACTION, ONGOING HARASSMENT AND MR. GELLER'S BAD FAITH ANTICS
28

1 **EXHIBIT A1- A5 - MEET AND CONFER CHART - AND ALL PAPERS**
2 **AND RECORDS ON FILE IN THIS ACTION, ONGOING HARASSMENT AND MR.**
3 **GELLER'S BAD FAITH ANTICS**
4
5

6 This exhibit contains EXHIBIT A1- A5 to support the Plaintiff's filing of
7 REQUEST FOR PROTECTIVE ORDER AGAINST FURTHER HARASSMENT AND BAD
8 FAITH LITIGATION CONDUCT & REQUEST FOR FRAUD INVESTIGATION REFERRAL
9
10

11 **EXHIBIT A1 THROUGH A5 ARE AS FOLLOWS:**
12
13

14 **EXHIBIT A1- MEET AND CONFER – FORMAL WRITTEN QUESTIONS**
15 **FOR RIOT GAMES LEGAL TEAM**
16

17 **EXHIBIT A2- FOLLOW-UP AND REQUEST FOR WRITTEN**
18 **RESPONSES – MAY 2 MEET AND CONFER**
19

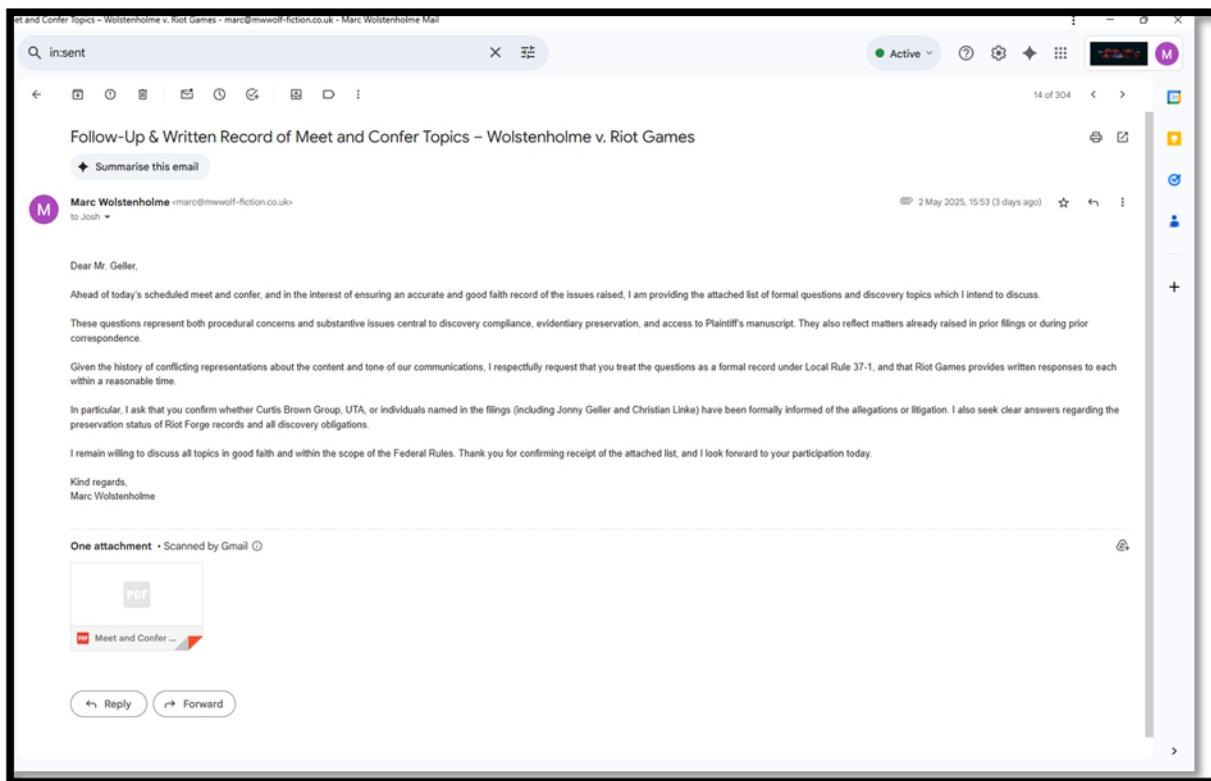
20 **EXHIBIT A3- MEET AND CONFER ISSUES CHART -**
21 **WOLSTENHOLME V. RIOT GAMES**
22

23 **EXHIBIT A4 – CONTINUED HARASSMENT INCIDENTS WHICH RIOT**
24 **GAMES HAS REFUSED TO CONDEMN (APRIL–MAY 2025)**
25

26 **EXHIBIT A5- MR. GELLER'S BAD FAITH ANTICS**
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28

1
2 **EXHIBIT A1- MEET AND CONFER – FORMAL WRITTEN QUESTIONS**
3 **FOR RIOT GAMES LEGAL TEAM**
4
5

6 Sent to Josh Geller- Fri 2 May, 15:53
7
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1 **FORMAL WRITTEN QUESTIONS FOR RIOT GAMES LEGAL TEAM**
2
3
4

5 Initial Disclosures & Discovery (Rule 26)
6
7

8 Why has Riot not produced Rule 26 initial disclosures as required under FRCP
9
10 and L.R.
11
12 26-1?

13 When does Riot intend to comply fully with its obligation to identify persons,
14 documents, and materials relevant to Plaintiff's claims?
15
16

17 Will Riot agree to produce a timeline for its internal development of Arcane
18 showing
19 when key scripts and production materials were created?
20
21

22 Document Requests (Requests for Production / RFPs)
23
24 Has Riot searched and preserved materials responsive to the term "Bloodborg,"
25 "“M.W.
26 Wolf," or similar or codename? If not, why?
27
28

1
2 Will Riot confirm whether any manuscript or longform material was downloaded,
3 saved,
4

5 or distributed from the Riot Forge system?

6
7 Interrogatories

8 Who were the individuals who reviewed submissions through Riot Forge between
9
2019
10 and 2022?

11
12
13 Who at Riot, Fortiche, UTA, or CBG had access to external submissions during
14 the
15 relevant period?

16
17 Has Riot disclosed all individuals involved in the casting and story development
18 of
19 Arcane from 2018 to 2022, if not when will they?

20
21
22 Riot Forge and Submission Systems

23
24 Will Riot formally admit or deny that its public Forge submission page allowed
25 attachments and did not require login, as demonstrated in Dkt. 118?

1
2 If Riot contests this, will they produce server-level audit trails to support their
3 claim?
4
5

6 Suppression & Spoliation of Evidence
7 Has Riot instituted a legal hold or preservation order for all submission-related
8 logs and
9 developer portal data?
10
11

12 Can Riot confirm that no relevant data from Forge or Riot's servers has been
13 deleted
14 since the start of this litigation?
15
16

17 Will Riot allow a neutral forensic examination of their developer portal for
18 evidence of
19 submission and review activity?
20
21

22 CBG, UTA, and Jonny Geller and Felicity Blunt Involvement
23 Has Riot, its counsel, or any third-party investigator informed Curtis Brown
24 Group (CBG)
25
26

1 or United Talent Agency (UTA) of the specific allegations regarding misuse of
2 Plaintiff's
3 manuscript?
4

5
6 Has Jonny Geller or Felicity Blunt been contacted, deposed, or issued a litigation
7 hold
8 notice in connection with this case?
9

10
11 Has Riot disclosed to CBG that its representations are central to a federal
12 copyright
13 dispute?
14

15 Involvement of Christian Linke and Amanda Overton
16 Has Christian Linke been notified of the criminal or forensic allegations pending
17 in this
18 matter?
19

20
21 Was Amanda Overton's submitted material obtained independently, or passed
22 through
23 agency coordination with UTA or CBG?
24

25
26
27 EXHIBIT A1- A5 - MEET AND CONFER CHART - AND ALL PAPERS AND RECORDS ON FILE IN THIS
28 ACTION, ONGOING HARASSMENT AND MR. GELLER'S BAD FAITH ANTICS

1 Requests for Admission (RFAs)

2 Why has Riot categorically denied all RFAs without qualification, even those
3 concerning

4 public information or timing (e.g., Arcane development dates)?

5
6
7 Is Riot willing to amend any RFAs to clarify or resolve disputed factual issues
8 prior to
9 motion practice?

10
11
12 Magistrate Recusal & Misconduct Allegations

13 Does Riot oppose Plaintiff's motion to recuse the Magistrate Judge for cause, and
14 will it
15 stipulate to reassignment to avoid further prejudice?

16
17
18 Will Riot deny the Plaintiff's documented concerns that improper pressure was
19 applied
20 during the confidential settlement process?

21
22
23 General Procedural Integrity

24 Will Riot commit to producing written responses to all questions raised in this
25 meet and

1 confer, in a form that can be used to establish a written record under L.R. 37-1?

2
3
4 Will Riot stipulate that it will not mischaracterize the tone, substance, or outcome
of
5
6 this meeting in any future filing?
7
8

9 Insurance Disclosure
10
11 Please confirm whether Riot Games has any applicable insurance coverage
relevant to
12
13 the claims or potential liabilities in this case, pursuant to Federal Rule of Civil
Procedure
14
15 26(a)(1)(A)(iv).
16
17 Harassment, Cult Activity, and Community Coordination
18
19 Has Riot taken any internal action or inquiry regarding repeated patterns of
harassment
20
21 and threats the Plaintiff received, including those that mirrored statements made
by
22
23 Riot at the settlement conference?
24
25 Will Riot disavow involvement with or coordination with community actors or
cult
26
27 9
28 EXHIBIT A1- A5 - MEET AND CONFER CHART - AND ALL PAPERS AND RECORDS ON FILE IN THIS
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1 followers harassing the Plaintiff?

2 Does Riot condone the conduct of its legal team, which includes repeated
3 attempts to

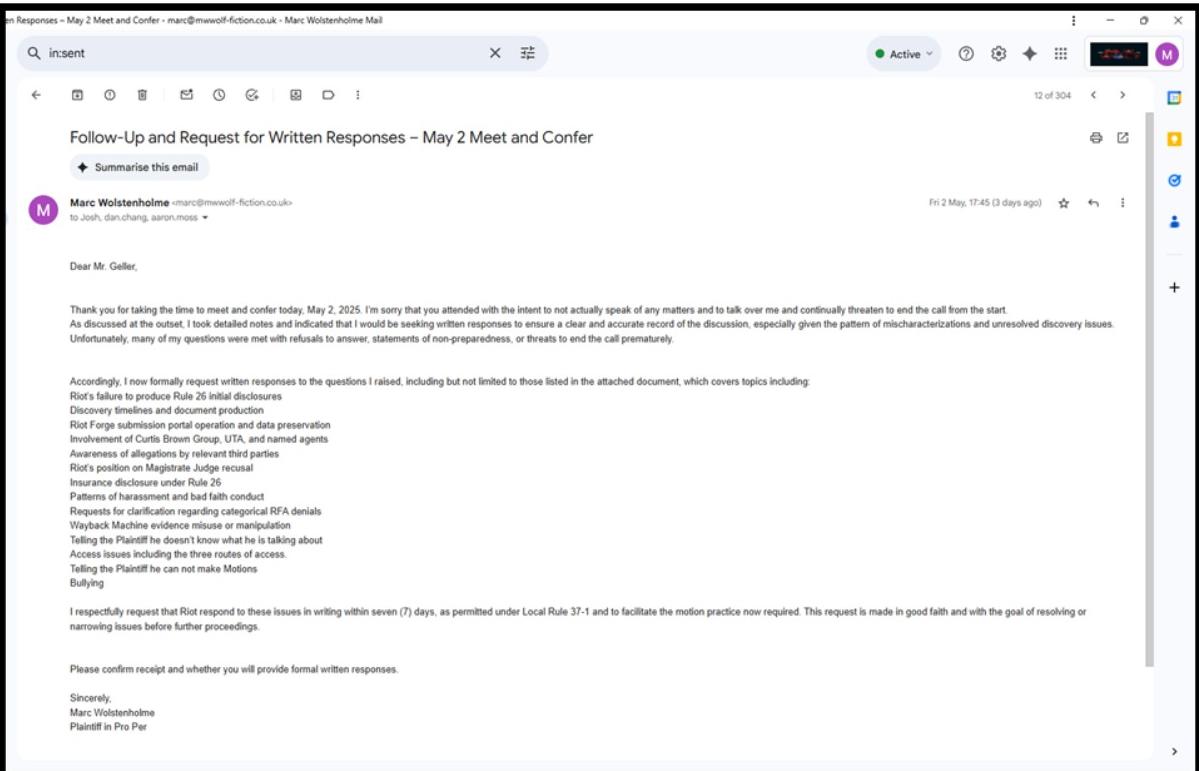
4 provoke or destabilize Plaintiff?

5 Notes...

10

27 EXHIBIT A1- A5 - MEET AND CONFER CHART - AND ALL PAPERS AND RECORDS ON FILE IN THIS
28 ACTION, ONGOING HARASSMENT AND MR. GELLER'S BAD FAITH ANTICS

1 EXHIBIT A2- FOLLOW-UP AND REQUEST FOR WRITTEN
2 RESPONSES – MAY 2 MEET AND CONFER

3 Sent to Josh Geller- 2 May 2025, 17:45
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9 Follow-Up and Request for Written Responses – May 2 Meet and Confer
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1 **FOLLOW-UP AND REQUEST FOR WRITTEN RESPONSES – MAY 2**

2 **MEET AND CONFER**

3 Dear Mr. Geller,

4 Thank you for taking the time to meet and confer today, May 2, 2025. I'm sorry
5 that you attended with the intent to not actually speak of any matters and to talk over me and
6 continually threaten to end the call from the start.

7 As discussed at the outset, I took detailed notes and indicated that I would be
8 seeking written responses to ensure a clear and accurate record of the discussion, especially
9 given the pattern of mischaracterizations and unresolved discovery issues. Unfortunately, many
10 of my questions were met with refusals to answer, statements of non-preparedness, or threats to
11 end the call prematurely.

12 Accordingly, I now formally request written responses to the questions I raised,
13 including but not limited to those listed in the attached document, which covers topics including:

14 Riot's failure to produce Rule 26 initial disclosures

15 Discovery timelines and document production

16 Riot Forge submission portal operation and data preservation

17 Involvement of Curtis Brown Group, UTA, and named agents

18 Awareness of allegations by relevant third parties

19 Riot's position on Magistrate Judge recusal

20 Insurance disclosure under Rule 26

21 Patterns of harassment and bad faith conduct

22 12

23 EXHIBIT A1- A5 - MEET AND CONFER CHART - AND ALL PAPERS AND RECORDS ON FILE IN THIS
24 ACTION, ONGOING HARASSMENT AND MR. GELLER'S BAD FAITH ANTICS

1 Requests for clarification regarding categorical RFA denials

2 Wayback Machine evidence misuse or manipulation

3 Telling the Plaintiff he doesn't know what he is talking about

4 Access issues including the three routs of access.

5 Telling the Plaintiff he can not make Motions

6 I respectfully request that Riot respond to these issues in writing within seven (7)
7 days, as permitted under Local Rule 37-1 and to facilitate the motion practice now required. This
8 request is made in good faith and with the goal of resolving or narrowing issues before further
9 proceedings.

10 Please confirm receipt and whether you will provide formal written responses.

11 Sincerely,

12 Marc Wolstenholme

13 Plaintiff in Pro Per

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28 EXHIBIT A1- A5 - MEET AND CONFER CHART - AND ALL PAPERS AND RECORDS ON FILE IN THIS
ACTION, ONGOING HARASSMENT AND MR. GELLER'S BAD FAITH ANTICS

EXHIBIT A3- MEET AND CONFER ISSUES CHART -

| Topic | Date(s) Raised | Plaintiff's Position | Riot's Response | Status |
|-------------------------------------------------------|-------------------------|--------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|------------|
| Failure to Provide Initial Disclosures | Multiple (Feb-Apr 2025) | Plaintiff repeatedly requested Rule 26 disclosures. | Riot delayed, citing bifurcation and settlement. | Unresolved |
| Discovery - Riot Forge Internal Servers | March-April 2025 | Plaintiff demanded production of internal submission servers, portals, and attachments. | Riot refused, claimed irrelevant, minimized open submission system. | Unresolved |
| Wayback Machine Misuse | April 2025 | Plaintiff objected to Riot's reliance on unreliable Wayback Machine instead of internal records. | Riot ambushed Settlement and continues to rely on Wayback Machine. | Unresolved |
| Suppression of Submission Portals | April 2025 | Plaintiff alleged Riot concealed real submission routes active during Arcane's development. | Riot denied active portals despite contrary evidence. | Unresolved |
| Access Routes through Agencies (UTA/CBG) | Feb-April 2025 | Plaintiff demonstrated overlap of agents and talent supporting access. | Riot has largely ignored this topic substantively. | Unresolved |
| Riot's Misleading Statements at Settlement Conference | April 2025 | Plaintiff alleged Riot misled Judge and Plaintiff about Forge submission availability. | Riot denied misconduct; asserted settlement confidentiality (improperly). | Unresolved |

| | | | | | |
|---|-----------------------------------------------------------|----------------|------------------------------------------------------------------------------|-------------------------------------------------------------|----------------------|
| 1 | <i>Spoliation / Evidence Preservation Failures</i> | April 2025 | Plaintiff concerned Riot failed to preserve server data and internal emails. | Riot has refused to confirm litigation holds or production. | Unresolved |
| 2 | <i>Harassment and Threats via Counsel and "Community"</i> | Feb-April 2025 | Plaintiff documented emails, threats, and bad faith pressure tactics. | Riot has denied responsibility, doubled down on pressure. | Ongoing |
| 3 | <i>Motions to Strike Legitimate Filings</i> | April 2025 | Plaintiff contests Riot's attempt to strike critical evidence disclosures. | Riot aggressively seeks to strike multiple filings. | Ongoing |
| 4 | <i>Motion to Lift Discovery Stay</i> | March 2025 | Plaintiff seeks to lift unjustified discovery stay and proceed. | Riot opposed, arguing bifurcation/stay should remain. | Pending Court Ruling |

13 **Notes:**

14 Plaintiff attempted to schedule meet and confers multiple times since February
15 2025.

16 Riot delayed substantive meet and confer discussions until after settlement
17 conference.

18 Riot's "availability" tactics have imposed unreasonable demands.

19 Plaintiff continues to seek good faith dialogue.

1 **EXHIBIT A4 – CONTINUED HARASSMENT INCIDENTS WHICH RIOT**
2 **GAMES HAS REFUSED TO CONDEMN (APRIL–MAY 2025)**
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During the May 2nd Meet and Confer, Mr. Josh Geller of Riot Games legal counsel gloatingly claimed that there had been no harassment, Riot has not seen any harassment, there is no record or filed evidence of harassment, and Riot would not condemn the harassment of its wider cult like community.

11 **Please see:**
12
13 Dkt 83-12- EXHIBIT BB: CHRONOLOGY OF HARASSMENT, THREATS,
14 AND INTIMIDATION, COUNSEL MISCONDUCT.
15
16
17 Dkt 117- NOTICE OF RECEIPT OF HARASSMENT AND IMPROPER
18 COMMUNICATIONS AND PLAINTIFF'S STATEMENT REGARDING SETTLEMENT
19 CONFERENCE CONFIDENTIALITY.
20
21 Dkt 119- NOTICE OF AMENDED MOTION TO COMPEL, LIFT DISCOVERY
22 STAY, AND FOR SANCTIONS. AND NOTICE OF EXTREME AND HARASSING
23 CONDUCT CONCERNS.
24
25
26
27 **16**
28 EXHIBIT A1- A5 - MEET AND CONFER CHART - AND ALL PAPERS AND RECORDS ON FILE IN THIS
ACTION, ONGOING HARASSMENT AND MR. GELLER'S BAD FAITH ANTICS

1 **Additionally, See prior filing in Help Copyright Infringement Allegations**
2 Arcane.docx, submitted to the Court and LAPD, documenting threats received through the
3 Plaintiff's website, which referenced Riot's legal counsel by name and coincide with key
4 litigation milestones. These threats predate Dkt. 131 and remain unresolved and proliferating.
5

6 In Dkt. 83-12, Exhibit BB, harassment incidents were logged from November 1,
7 2024, 03:47 AM to March 4, 2025, 10:21 PM.

8 The following table -Exhibit A4 - supplements that chronology by documenting
9 new harassment incidents received through Plaintiff's website and legal email address since
10 March 4, 2025. These incidents are increasingly litigation-related, referencing motions, filings,
11 and the involvement of named individuals in this case.

13 Moreover, at least one of the filings impersonates the Judge, which is a crime
14 already logged in earlier harassing and intimidating communications from Riot's cult like
15 community.

1 **A4 Harassment Log – 1- 37**

| 2 <i>Entr y #</i> | 2 <i>Date & Time</i> | 3 <i>Source</i> | 2 <i>Message Content</i> |
|-----------------------|------------------------------------|------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4 1 | 5 Fri 7 Mar, 6 01:10 | 7 Website Form 8 Submission 9 (Squarespace) | 10 Email: liar@lies.com Message: Hi, I noticed that in your case you stated 11 (alongside a bunch of random delusional shit) that you 12 were banned from Twitter due to Riot's antics to 13 "silence" you. We both know that's a lie, you were 14 banned because you were harassing people, from artist 15 to animators, to cosplayers and even just fanfic written, 16 name-calling them, and sometimes even going as far as 17 tweeting sexist shit and stalking women. That is the 18 reason you got banned. But don't worry, I saved all 19 those screenshots (only around to 90 of them, since you 20 spammed over 150 times A DAY) because I knew it 21 would help the jury to know the kind of dirty liar and 22 stalker they are actually dealing with <3 I just send a 23 copy to Riot's legal team. |
| 2 2 | 3 Unknown | 4 Website Form 5 Submission 6 (Squarespace) | 7 Email: haha@youarefucked.com Message: Hey, I have great news!!!! I got word today 8 from Mr. Andrew Lux, they received my email with 9 proof screeshots and of you soliciting money for 10 evidence and he was very thankful for it, he said that's 11 going to make his job waaay more easy :) fuck you this 12 is what you get for harassing ACTUAL artist on twitter 13 with your delusions |
| 14 3 | 15 Fri 21 Mar, 16 19:34 | 17 Website Form 18 Submission 19 (Squarespace) | 20 Email: Icanbelieve@this.com Message: do not fuxking tell me the rumors are true 21 and your fucking lawyer abandoned the ship lmaoooo 22 they know you are delulu |
| 23 4 | 24 Tue 1 Apr, 25 20:11 | 26 Website Form 27 Submission 28 (Squarespace) | 29 Email: laswenasweas@weas.com Message: " PLAINTIFFS NOTICE OF CONCERN REGARDING LITIGATION CONDUCT HARMFUL IMPACT ON PLAINTIFFS DISABILITY, AND REQUEST FOR COURT GUIDANCE AND PROTECTIVE ORDER" YOU choose to self-represent, don't start crying now because things aren't going according to your plan due to your incompetence and delusion |

| | | | | |
|---|---|---------------------|---------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | 5 | Mon 7 Apr, 07:28 | Website Form Submission (Squarespace) | <p>Email: hahaha@haha.com</p> <p>Message: You are legit becoming more and more deranged with every motion you present lmaoooo</p> <p>"Government and who are aggressively expanding into many avenues of data control and are linked to Military-civil fusion policies whether they like it or not. This should raise big fat red flags." ??????? That's 1950 cold war levels of conspiranoic</p> <p>And I'm gonna be honest, this is not some "insider knowledge from the company" you fucking dumb bitch. The case is open to the public. And since you decided to use your Twitter account to harras every single fan account (some of them girls who were only 15years old, fucking pervert pedophile) with over 100 tweets a day, don't act surprised when a group us makes a discord server to make fun of you. And we are also working on a youtube video. One of us is a youtuber with 7k subs, we are going to expose your delusion and so everyone knows the kind of little shit you are. That's why they closed down your Twitter, but you so graciously forgot to mention it. Don't worry, we have proof, and we are going to make sure Aaron gets it.</p> |
| 6 | 6 | Mon 7 Apr, 07:53 | Website Form Submission (Squarespace) | <p>Email: youare@pedophile.com</p> <p>Message: Oh, you are crying to the court now?? Crying about doxxing??? Like a little baby??? Well guess what, 6 months ago you were man enough stalk and spam the one of my friends in X. She was just girl making some fanart. She was a minor. She respectfully asked you to stop. And you didn't.</p> <p>So now you better be man enough to deal with the fallout. We are not gonna stop. We are gonna make to find every person on your neighborhood, your work, your family. We are gonna show them the kind of shit you are. We already have compiled a bunch of mails and ig accounts.</p> <p>You are a misogynistic adult who wanted to</p> |

| | | | |
|----|----|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | | | namecall a girl who was not even 17 years old. Deal with the consequences of it. Batch. |
| 2 | 7 | Mon 14 Apr, 08:18 | Website Form Submission (Squarespace) |
| 3 | 8 | Tue 15 Apr, 07:44 | Website Form Submission (Squarespace) |
| 4 | 9 | Tue 15 Apr, 23:46 | Website Form Submission (Squarespace) |
| 5 | | | Email: kkkkk@kkkk.com Message: Motion for Relief?? Oh you are getting desperate now 🤦‍♂️🤦‍♂️🤦‍♂️🤦‍♂️🤦‍♂️ |
| 6 | | | Email: fart@loser.com Message: AHAHAHAHAAHAAHAAH YOUR MOTION FOR UNDER SEAL FILLING GOT DENIED AHAHAHAHAAH OH WE ARE GONNA KNOW EVERYTHING YOU ARE SO COOKED |
| 7 | | | Email: itsjoever@foryou.com Message: <u>https://x.com/InternetH0F/status/1911117326528692734</u> |
| 8 | | | Thats exactly whats gonna happen to you after the court read that you are trying to use ai slop to defend your case and I cant wait to see it |
| 9 | 10 | Mon 28 Apr, 11:04 | Website Form Submission (Squarespace) |
| 10 | | | Email: strikingdocuments@gmkil.com Message: 21 one 21 stricken documents IN FOUR MONTHS Any sane person would realize how fucking insane that is Anyone except you apparently |

| Entry # | Date & Time | Source | Message Content |
|---------|-------------------|---------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 11 | Fri 25 Apr, 03:08 | Website Form Submission (Squarespace) | Email: Ahahaha@AHAHAHA.com Message: nice setlement you fucking idiot Ahahahhahahahahasshah |
| 12 | Fri 25 Apr, 03:24 | Website Form Submission (Squarespace) | Email: cryinglaugh@real.com Message: Dude. DUDE I can't stop laughing. Everytime I think you can't get dumber, you go and prove me wrong. The fucking screenshot as "proof that Riot Forge could handle submissions" you sent literally PROVES YOU WRONG. That form is for game developers. It doesn't allow attachments. Even if you went in and fucking copypasted the entire manuscript, those boxes are usually programed to stop sending any charcters after 15 k to avoid spam |

| | | | |
|---|----|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | | | You just lost your own case. This is just so fucking funny |
| 2 | 13 | Mon 28 Apr, 17:06 | Website Form Submission (Squarespace) Email: speedtest@lit.com Message: hold on I wanna see how fast you can file a motion clogging the dock with irrelevant data 3 2 1 GO GO GO |
| 3 | 14 | Mon 28 Apr, 17:08 | Website Form Submission (Squarespace) Email: gotimego@google.com Message: for the last time its not "insider info" is a fucking google search you moron the case is open to the public |
| 4 | 15 | Mon 28 Apr, 21:08 | Website Form Submission (Squarespace) Email: kkkli@kkal.com Message: I feel so sorry for Brianna... she was just trying to save your sorry ass from being bankrupted by the legal fees you will own riot after losing, try to explain to you why your claim has no legal grounds, and you went in and accused her of improper conduct... but yeah, GREAT tactic to insult the people who tried to help you |
| 5 | 16 | Mon 28 Apr, 23:14 | Website Form Submission (Squarespace) Email: bsst@bwt.com Message: I'm just now reading through your analysis of Blood Sweat and Tears and genuinely cant believe you submitted that. First of all:you describe things that straight up not happen in the video. You are, in the most literal sense of the world, making shit up. Example: "The video opens with sweeping shots of Noxian battlefields..." — no it fucking doesn't [...] You used fucking chat gpt to analyze the video and presented that as an evidence WITHOUT EVEN CHECKING IF THE GODDAMM THING WAS CORRECT. [...] YOU DO NOT OWN AFRICAN CULTURE |
| 6 | 17 | Tue 29 Apr, 00:35 | Website Form Submission (Squarespace) Email: update@papa.com Message: Update: TWENTY FOUR STRICKEN DOCUMENTS IN LESS THAN 4 MONTHS. Are you triyng to get a new record? C'mon my dude!! I believe in you!!! Let's get to those sweet sweet 30 stricken documents before the hearing on 5/8 !!! Let's goooooo |
| 7 | 18 | Tue 29 Apr, 20:21 | Website Form Submission (Squarespace) Email: ANDNOTHERONE@meme.com Message: LADIES AND GENTLEMEN WE GOT ANOTHER STRIKE!!! HELL YEAH!!!! |

| 1 2 3 4 5 6 7 | 19 Wed 30 Apr, 03:07 | Website Form Submission (Squarespace) | Email: awu@usa.com Message: Your entire argument is si fucking moronic, because you can't tell me, in good faith, that someone would go to a GAME DEVELOPER page that has form clearly intended for GAME DEVELOPERS and submit an entire fucking book in a submission box and then claim it's valid. But also, saying that your manuscript was "widely disseminated to over a 100 agencies" makes YOU look even worse [...] THAT'S NOT WHAT "WIDELY DISSEMINATED" MEANS IN LEGAL TERMS you dumb fuck. |
|----------------------------------------------|--------------------------------------|----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 8 9 10 | 20 Wed 30 Apr, 14:36 | Website Form Submission (Squarespace) | Email: reassignment@lis.com Message: Ah yes, requesting to reassign judges because you are butthurt after they tried to explain to you how fucking deranged you are. That surely will not backfire at all. |
| 11 12 | Entr y # Date & Time | Source | Message Content |
| 13 14 15 16 17 18 19 20 | 21 Wed 30 Apr, 18:0 3 | Website Form Submission (Squarespace) | Email: vietnamise@ai.com Message: I'm going to give you a clue that your idiotic brain could not get, and I'm only going to do that because of how sweetly ironic it is: The Vietnamese company is not a fucking military conspiracy against you, is just an ai crawler. Anyone who has the a modicum of understanding of how ai crawlers work can deduce that in a second. Most likely, it didn't target <i>your</i> site specifically, but rather all blogs hosted in squarespace. They are going to scrape every single word you have ever written in your blog and use it to feed the plagiarism machine that ai is.... the same machine whose use you defended when you were making those fugly ai images for your blog... The irony is so sweet, it would almost be enjoyable if those stupid things weren't burning the planet |
| 21 22 23 24 25 | 22 Thu 1 May, 23:1 0 | Website Form Submission (Squarespace) | Email: yougottmail@dontdissmiss.com Message: You know what the funniest part of all the bullshit you have sent is (so far)? Writing 67 pages of pure unadulterated conspiranoic slop, get that document stricken AND THEN TRYING AGAIN but starting with a "Legal disclaimer- I am allowed to express my concerns..." AND BELIEVING THAT IT WILL NO HAVE ANY SANCTIONS LATER how do you think Mister Fernando will take |

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EXHIBIT A1- A5 - MEET AND CONFER CHART - AND ALL PAPERS AND RECORDS ON FILE IN THIS ACTION, ONGOING HARASSMENT AND MR. GELLER'S BAD FAITH ANTICS

that??? Don't worry, I will sent an email to his clerk (Vanessa) on the morning of 5/8 to remind him how much you like to spit in his face. I think it would be really fun :)

| | | | |
|----|-------------------------|----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 23 | Fri 2 May, 15:2 7 | Website Form Submission (Squarespace) | Email: procedural@technicalitie.com Message: ".... following the Court's guidance, and ensuring that the merits of the case — rather than procedural technicalities— are fairly addressed" — This is exactly the reason why you hire a fucking lawyer. When talking about Copyright claims, those menial "procedural technicalities" ARE THE MERITS of the case. But then again, no fucking lawyer would take you... YOU ARE FROM UK is not their fucking fault that TIME ZONES EXISTS- YOU are the one who choose to litigate in CA |
| 24 | Fri 2 May, 21:1 1 | Website Form Submission (Squarespace) | Email: ahahaha@haha.com Message: HAHAHAHAHAHAHAHAAHHAHAAHAHAHAAHHA |
| 25 | Fri 2 May, 21:1 3 | Website Form Submission (Squarespace) | Email: hahaha@haha.com Message: Here is your medal 🎉 congratulations on winning the first place in the "pissing off an entire court" race. No one had ever done so in such little time |
| 26 | Fri 2 May, 21:2 7 | Website Form Submission (Squarespace) | Email: STRIKE@BABY.com Message: The absolute fucking DISRESPECT of resubmitting THE SAME MOTION not even 24 hours after it was struck is already horrible behavior BUT then you ALSO GO TO TRY TO EXPLAIN THE LAW TO A MAGISTRATE JUDGE. A pro se litigant FROM ANOTHER COUNTRY. Your fucking ego dude |
| 27 | Fri 2 May, 23:2 9 | Website Form Submission (Squarespace) | Email: win@win.com Message: Hey, I have a game for you: 1- Go to google images 2- Search "art deco designs" 3- Count how many "M" and "W" shapes you can find. I got around 70 in the first page! 4- Sue the entire art deco movement for plagiarizing your manuscript since clearly that's proof enough. For bonus points: Do the same with art nouveau |
| 28 | Fri 2 May, 23:4 2 | Website Form Submission | Email: mail@dos.com Message: Your case is probably getting dismissed after the hearing and I'm gonna miss seeing you ridicule yourself in front of every competent person involved in the legal system : |

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EXHIBIT A1- A5 - MEET AND CONFER CHART - AND ALL PAPERS AND RECORDS ON FILE IN THIS ACTION, ONGOING HARASSMENT AND MR. GELLER'S BAD FAITH ANTICS

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|----|----|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | | (Squarespace) | ,,(Can you start another litigation against netflix after that?? a season 2 of whining delusions??? |
| 2 | 29 | Sat 3 May, 02:3 4 | Website Form Submission (Squarespace) Email: ma@liad.com Message: we made a new game drinking in our discord group: open literally any page of the document and try NOT to find absolute delulu bullshit. Everyone lost at their first try. This excerpt made us loose our shit fr: "This again shows that the Arcane creators hid things in the visuals of the story. However, letters are made of paper. The letter is not a mirror nor glass or metal, I don't really understand why they have shown a reflection here" BECAUSE THE DIDN'T. THERE IS NOTHING THERE YOU ARE LITERALLY SEEING THINGS. |
| 3 | 30 | Mon 5 May, 23:3 8 | Website Form Submission (Squarespace) Email: tu@laj.com Message: "aditionally, Plaintiff notes that publication dates on platforms such as YouTube, including Riot's own channels, can be manually altered or masked through internal CMS tools or metadata manipulation..." This is THE unhinged claim of the week. Are you saying that they fucking hacked youtube to change the date of the announcement video?? [...] ALSO ALSO every time you keep mentioning the screenshot you are digging your own grave deeper and deeper. The conference is confidential and NON-BINDING. they literally could have shown whatever bullshit they want, and you are going to put 9823 motions disputing it and is not going to get you anywhere lmaooo |
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| ENTRY # | DATE & TIME | SOURCE | MESSAGE CONTENT |
|---------|------------------|----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 31 | Tue 6 May, 02:01 | Website Form Submission (Squarespace) | Email: notreally@ras.com Message: So, at the end of the day, your argument is "I shoved my manuscript into everyone faces, even when they were not asking for it, using whatever means of communication were available even they were clearly not designed to do so. And now if anyone takes extremely common narrative elements to any fantasy/sci-fi story, I can claim it was my idea and sue them for copyright!" |

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EXHIBIT A1- A5 - MEET AND CONFER CHART - AND ALL PAPERS AND RECORDS ON FILE IN THIS ACTION, ONGOING HARASSMENT AND MR. GELLER'S BAD FAITH ANTICS

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|----|----|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | | | You do realize why that is not gonna fly right? |
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| 6 | | | |
| 7 | 32 | Tue 6 May, 03:24 | Website Form Submission (Squarespace) Email: briana@jugde.com Message: Let me fix this entry for you: "Plaintiff doesn't feel safe to attend the May 15th hearing with the same Magistrate judge. Plaintiff cries like a fucking baby when a women with over a decade of the highest legal experience tries to correct him. Plaintiff soils himself and wails for his binky whenever he is told that he is wrong. Wahh wahh wahh" |
| 8 | 33 | Tue 6 May, 08:17 | Website Form Submission (Squarespace) Email: lmai@hum.com Message: My God you are beyond delusional AND stupid. The fucking table with "over 50 animators" directly contradicts your own claims, but you are so up your arse that you can't even see that. [...] But again, at the end of the day, you are only showing your own ignorance. Because if you had the faintest idea of how large-scale animation is produced, you would know that the "bulk" of the show is not made by the guy on twitter with over 3k followers, but by a bunch of smaller full time workers that make sure all the fingers move right and the hair and clothes don't phase through walls. But you go bath in your ignorance I guess |
| 9 | 34 | Tue 6 May, 19:39 | Website Form Submission (Squarespace) Email: courtla@uscads.com Message: ORDER GRANTING DEFENDANT RIOT GAMES' MOTION TO DISMISS SECOND AMENDED COMPLAINT [...] Just sending you this so you can start to mentally prepare :) |
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EXHIBIT A1- A5 - MEET AND CONFER CHART - AND ALL PAPERS AND RECORDS ON FILE IN THIS ACTION, ONGOING HARASSMENT AND MR. GELLER'S BAD FAITH ANTICS

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|---|----|------------------------|---------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | 35 | Tue 6 May, 22:13 | Website Form Submission (Squarespace) | Email: truly@yours.com Message: So, your "evidence" for proving that Riot got their script from your manuscript is... to present that there were writers already working towards Arcane since 2016? Huhhhh Masterful gambit sir |
| 2 | 36 | Wed 7 May, 06:03 | Website Form Submission (Squarespace) | Email: number@dock.com Message: In a docket that currently amasses 135 entries, you have filed 69. And out of those, 28 has been struck. That's almost over a half of everything you have presented. In fact, the dock entry is so high because of all the orders Mr Olguin had to issue to fix all the irrelevant shit you presented. And you still think you have a chance at winning this |
| 3 | 37 | Wed 7 May, 07:37 | Website Form Submission (Squarespace) | Email: reassignment@lis.com Message: Ah yes, requesting to reassign judges because you are butthurt after they tried to explain to you how fucking deranged you are. That surely will not backfire at all. |

1 **PLAINTIFF'S STATEMENT REGARDING THE NATURE AND LEGAL**
2 **IMPLICATIONS OF DOCUMENTED HARASSMENT**
3
4

5 1, Pattern and Severity of Harassment
6

7 The harassment recorded above demonstrates an ongoing, coordinated, and
8 escalating campaign of abuse directed at the Plaintiff by individuals who identify as members of
9 or supporters of Riot Games' online community. The tone, frequency, and content of these
10 submissions, including references to court proceedings, legal filings, private communications,
11 and even impersonation of court officials, suggest a level of obsession and collective behavior
12 that exceeds normal criticism or disagreement. The behavior has become cult-like, persistent,
13 and targeted.

14 2, Intimidation
15

16 While public litigation can attract commentary or social media discourse, the
17 volume, vulgarity, threats, and impersonations documented here are not normal or acceptable in
18 any legal context. The extent of personal abuse, coordinated tracking of court dockets,
19 impersonation of court personnel, and references to the Plaintiff's legal and personal history
20 suggest a malicious intent to intimidate and suppress the Plaintiff's ability to litigate.

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27 EXHIBIT A1- A5 - MEET AND CONFER CHART - AND ALL PAPERS AND RECORDS ON FILE IN THIS
28 ACTION, ONGOING HARASSMENT AND MR. GELLER'S BAD FAITH ANTICS

1 3, Riot Games' Responsibility and Legal Questions

2 While Riot Games may not have authored all of these submissions directly, its
3 refusal to condemn the conduct, despite repeated notices, raises serious concerns. During the
4 May 2nd Meet and Confer, Mr. Geller gloatingly declined to comment, then denied that any
5 harassment had taken place, suggested that the Plaintiff is making everything up and that there is
6 no evidence of harassment in the filings, and the Plaintiff believes things that are not real.

7 A party in litigation has an obligation to conduct itself in good faith, not to join in
8 on the harassment and gaslighting and to weaponize the disadvantages of a disabled litigant in
9 person. Courts have held that when a party is aware of third-party misconduct and fails to act, or
10 tacitly encourages it, the party may be subject to sanctions or injunctive relief.

11
12 Relevant legal doctrines may include:

13
14 Civil Harassment and Cyberstalking statutes (e.g., Cal. Civ. Proc. Code § 527.6);
15
16 Judicial estoppel and sanctions under Rule 11 for enabling or benefiting from bad-
17
18 faith conduct;

19
20 Doe v. Internet Brands, Inc., 824 F.3d 846 (9th Cir. 2016): Establishes limited
21 duty of website operators to warn users of known risks;

22
23
24 Gomez v. City of Fremont, 730 F. Supp. 2d 1056 (N.D. Cal. 2010): Recognizes
25 state-created danger doctrine in failure to act cases.

1 4, What Can the Court Do?

2 The Court has broad powers to protect litigants from abuse, including:

3
4
5 Issuing a protective order under Fed. R. Civ. P. 26(c) or court's inherent
6 authority;

7 Referring the matter for federal investigation if impersonation of court personnel
8 is substantiated;

9
10 Ordering Riot Games to issue a formal public condemnation of harassment;

11
12 Limiting Riot's communications or filings under local rules or standing orders;

13
14
15 Imposing sanctions or reconsidering discretionary rulings where Riot has
16 benefited from abuse.

17
18 5. Plaintiff's Request

19
20 Plaintiff requests that the Court formally acknowledge the ongoing harassment
21 and issue a protective order or similar relief to deter further abuse and allow for litigation on the
22 merits, not intimidation.

1 EXHIBIT A5- MR. GELLER'S BAD FAITH ANTICS
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| 4 ISSUE REPORTED | 5 DETAIL / QUOTE |
|------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6 THREATS AND BULLYING AT SETTLEMENT CONFERENCE | 7 "Riot misused a Settlement Conference... Plaintiff was directly told that Riot intended to, and will, abuse and bully until they win." |
| 8 THREATS FROM RIOT LEGAL AND COMMUNITY | 9 "Threatened... with bond demands and case- ending motions; community harassment downplayed." |
| 10 SUPPRESSION OF SUBMISSION PORTALS AND SPOILATION | 11 "Riot concealed real submission routes... failed to preserve internal emails or server data." |
| 12 MISUSE OF THE WAYBACK MACHINE AS MANIPULATED EVIDENCE | 13 "Ambushed Settlement and continues to rely on Wayback Machine despite internal records." |
| 14 PROCEDURAL OBSTRUCTION AND INTIMIDATION | 15 "Designed not to litigate the merits but to exhaust, destabilize, and silence a pro se Plaintiff." |
| 16 PRESSURE TO POST A £100,000 BOND | 17 "Wholly disproportionate to Plaintiff's means... intended to chill access to the courts." |
| 18 PSYCHOLOGICAL AND EMOTIONAL DISTRESS | 19 "Caused undue psychological distress... Plaintiff lives with a clinically diagnosed anxiety disorder..." |
| 20 DISRESPECTFUL TONE AND INTIMIDATION DURING MEET AND CONFER | 21 "Josh Geller began the call with threats, talking over me, and refused to answer questions." |
| 22 ALLEGATIONS OF FRAUD ON THE COURT | 23 "Request referral to DOJ or State Bar for fraud and concealment of evidence... coordinated abuse." |
| 24 HARASSMENT AND RETALIATION VIA FILINGS | 25 "Riot continues to misused the court and their power to violate the Plaintiff... as they tiptoe along the line of the perception of legality." |

Declaration of Authenticity:

I, Marc Wolstenholme, declare under penalty of perjury that the statements made
are true and accurate

Executed on May 07, 2025, in Coventry, England.

Respectfully submitted,

Signature: M.WOLSTENHOLME

Marc Wolstenholme

Plaintiff in Pro Per

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